REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated November 19, 2010 and the Advisory Action dated February 25, 2011 have been received and its contents carefully reviewed.

Applicants further thank the Examiner for the courtesies extended to Applicants during the telephonic interview conducted on March 16, 2011. The substance of the interview is incorporated in this Response.

Applicants have amended claim 1. Support for the amendments to claim 1 can be found, at least, at page 7:17-20, page 8:6-7 and Figure 3D of the specification. No new matter has been added. Thus, claims 1-9 and 11-27 are currently pending with claims 11-26 having been withdrawn from consideration. Applicants respectfully request reconsideration of the pending claims.

The Office Action rejects claims 1-9 and 27 under 35 U.S.C. 103(a) as being unpatentable over Applicants' Admitted Prior Art (hereinafter "APA"). As discussed during the interview, the Examiner is actually rejecting claims 1-9 and 27-28 over APA in view of U.S. Patent No. 6,188,458 to Tagusa ("Tagusa"). Applicants respectfully traverse the rejection.

Claim 1, as amended, is allowable over the cited references in that claim 1 recites a combination of elements including, for example, "...a first adhesion conductive layer located only on the area of the third conductive layer exposed by the first contact hole and a second adhesion conductive layer located only on the area of the pad layer exposed by the second contact hole, wherein the first adhesion conductive layer is directly contacted with the third conductive layer and the second adhesion conductive layer and the first adhesion conductive layer, a fourth conductive layer on the second insulating layer and the first adhesion conductive layer on the second insulating layer and the second adhesion conductive layer and electrically contacting the pad layer, wherein the first and second adhesion conductive layers are respectively contained within the first contact hole and in the second contact hole, wherein the width of the first adhesion conductive layer is identical with the width of the second adhesion conductive layer is identical with the width of the second

contact hole." None of the cited references, singly or in combination, teaches or suggests at least these features of the claim 1.

The Office purports that the APA discloses "a first adhesion conductive layer, 24B, on the exposed portion of a third conductive layer and a second adhesion conductive layer, 14B, on the exposed portion of the pad layer." Office Action at p. 4. Applicants respectfully disagree. Even if one of ordinary skill in the art construed the APA's lower drain electrode 24B as "the third conductor" recited in claim 1 and the APA's lower gate pad 14B as the "pad layer" recited in claim 1, the APA still fails to teach or suggest "a first adhesion conductive layer on the exposed portion of a third conductive layer and a second adhesion conductive layer on the exposed portion of the pad layer." Applicants respectfully submit that the lower layer drain electrode 24B and the lower gate pad 14B do not have a portion exposed by a contact hole as recited in claim 1. Further, the Office admits that APA "does not explicitly disclose an embodiment wherein the first and second adhesion conductive layers are respectively contained within the first contact hole and in the second contact hole.

Tagusa fails to cure the deficiencies of APA. The Office asserts that "Tagusa teaches ... a metal layer, 41 ... deposited such that it is exclusively and entirely contained [within] the contact hole, 26b." Office Action at p. 5. Applicants disagree. Tagusa discloses "after the formation of the contact hole 26b, the cleaning solvent tends to permeate from the contact hole into the interface between the resin and the underlying transparent conductive film, causing the resin film to peel from the transparent conductive film" and "[i]n order to overcome this trouble ... the metal nitride layer 41 ... is formed on the transparent conductive film under the contact hole." Tagusa at col. 12:16:23 and Figure 5. Therefore, Tagusa also applies the metal nitride layer 41 in the area outside of the contact hole at the interface between the resin and underlying transparent conductive film. In contrast, claim 1 recites "the first and second adhesion conductive layers are respectively contained within the first contact hole and in the second contact hole, wherein the width of the first adhesion conductive layer is identical with the width of the first contact hole and the width of the second adhesion conductive layer is identical with the width of the second contact hole."

For at least these reasons, Applicants respectfully request that the Office withdraw the 35 U.S.C. § 103(a) rejection of independent claim 1. Claims 2-9 and 27 depend from independent claim 1. It stands to reason that the 35 U.S.C. §103(a) rejection of those dependent claims should be withdrawn as well.

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If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to Deposit Account No. 50-0911.

Dated: March 18, 2011 Respectfully submitted,

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